

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	
)	CR. NO. 2:07-cr-217-WKW
JOSEPHINE HAMILTON,)	
a/k/a Josephine L. Hamilton,)	
a/k/a Josephine Hubbard.)	
)	

United States's Motion for Downward Departure for Substantial Assistance

The United States moves this Court to reduce Defendant Josephine Hamilton's sentence by one offense level based on Hamilton's substantial assistance in this case. As grounds for this Motion, the United States notes:

1. Prior to pleading guilty in this case, Hamilton cooperated with the United States. Hamilton provided valuable information about at least two important criminal targets—one indicted and one currently unindicted—both in regards to FEMA fraud and other criminal activity. Prior to pleading guilty, Hamilton also testified before a Grand Jury sitting in the Middle District, and based on that testimony, the United States expects to return an indictment against the latter target.

2. The United States submits that to the best of its knowledge Hamilton has been truthful with federal investigators. As part of the plea agreement, Hamilton has waived her right to appeal and/or collaterally attack the sentence imposed in this case. Therefore, United States asks this Court to depart one offense level under Guidelines § 5K1.1 based upon Hamilton's substantial assistance.

Respectfully submitted this the 1st day of April, 2008.

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CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Benjamin E Schoettker.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney